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January 6, 2016

VIA Electronic Filing and E-Mail

Hon. John F. Keenan
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

*Re: The State of New York Ex. Rel. Vinod Khurana and the City of New York Ex
Rel. Vinod Khurana v. Spherion Corp. (N/K/A SFN Group, Inc.), 15 cv 6605 (JFK)*

Dear Judge Keenan,

We are counsel for Relator Vinod Khurana in the above-referenced action and submit this letter in accordance with Rule 1.A of Your Honor's Individual Practices.

We respectfully request an extension of time to file the Motion for Relator's Share, which originally had been filed in the New York Supreme Court, County of New York.¹ With the Court's permission, we request our time to file the moving papers be extended to Friday, January 8, 2016 and that the City of New York file its opposition on January 15, 2016.

We have conferred with counsel for the City of New York and they have agreed to this schedule. This is our first request for an extension and will not interfere with any other pre-existing schedule.²

We appreciate Your Honor's consideration of this request.

Respectfully submitted,

/s/ David E. Kovel
David E. Kovel

cc: All counsel of record via e-mail.

¹ At a status conference on December 21, 2015, the Court ordered that the already-briefed portions of the motion to be filed by Relator and New York City serially and for the not-yet-briefed portion (i.e., Relator's reply) to be filed on March 17, 2016.

² Defendant SFN Group is not involved in this motion.